

REMARKS/ARGUMENTS

Claim 36 is pending in the present application. Claims 1-35 were previously canceled; and claim 36 was amended. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 112, Second Paragraph

The Examiner has rejected claim 36 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. Specifically the Examiner stated that “[e]vidence that claim 36 fail(s) to correspond in scope with that which applicant(s) regard as the invention can be found in paragraph 0042 of the specification, wherein it is disclosed that “The determination of whether a turn has occurred can be based on a predesignated factor such as the amount of textual data entered or a time period.” However, the amended claim 36 discloses that “wherein a plurality of bases upon which the determining whether a turn has occurred comprise: an amount of textual data entered; a time period; and a plurality of successive statements.” Claim 36 has been amended to overcome this rejection.

Therefore, the rejection of claim 36 under 35 U.S.C. § 112, second paragraph has been overcome.

II. 35 U.S.C. § 103, Obviousness

The Examiner has rejected claim 36 under 35 U.S.C. § 103 as being unpatentable over Briggs et al., U.S. Patent No. 7,080,139 B1 (hereinafter *Briggs*); in view of Herf et al., U.S. Publication No. 2005/0021624 A1 (hereinafter *Herf*); and further in view Marston et al., U.S. Publication No. 2004/0260710 A1 (hereinafter *Marston*); and further in view of Bogard, U.S. Patent No. 6,757,365 B1 (hereinafter *Bogard*); and further in view of St. John et al., U.S. Publication No. 2006/0004702 A1 (hereinafter *St. John*); and further in view of Solomon, U.S. Publication No. 2005/0164154 A1 (hereinafter *Solomon*). Office Action pp. 4-14. This rejection is respectfully traversed.

Claim 36 has been amended to add, inter alia, the following limitations:

- wherein a turn means a shift in a textual communication during the chat indicated by the plurality of successive statements; and

- wherein a topic shift means a change from a first topic or a first subtopic to a second topic or a second subtopic in the chat where the change is indicated by a selection of a new topic marker, a new subtopic marker, or a new topic input entry field and an attachment of the new topic marker or the new subtopic marker to a chat transcript or a chat transcript segment.

Support for the amendments to claim 36 is found in paragraph [0039] defining the term “turn” and paragraph [0040], defining the term “topic shift.” Applicant submits that these terms further clarify the distinctions over the prior art.

A. “a method for using topic tags in an Instant Messaging System ii) comprising: identifying a topic”

Claim 1 recites “a method for using topic tags in an Instant Messaging System ii) comprising: identifying a topic.” The Examiner cites *Briggs* (column 2, lines 26-41 which discloses an Instant Messaging System that collects a user's computer usage experience and shares that data among the user's buddies; Fig. 8D that shows a "Topic Sharing" tab and a list of topics 892 to select/deselect from by clicking in the checkboxes 891 or specifying the topic tags 893 entered by the user; column 8, lines 42-45 disclose the same details). The Examiner further cites *Briggs* (Fig. 8D, topics list 892, checkboxes 891 for identifying a topic, "+ Add Topic Area" 893 for a custom topic; column 8, lines 42-45 disclose the same details).

In *Briggs*, Fig 8D is a topic sharing interface for the administration of buddy lists. A user can select topics to share with the user's buddies. *Briggs* does not teach the use of topic tagging. *Briggs* teaches only the selection of a topic folder to share with other buddies. With Applicants' invention, the user can assign topic tags before and/or after a chat, select from a list of topics before and/or after a chat, or Applicants' system can automatically assign topic tags. Applicants' topic tags can later be used to search topics.

B. “by performing a first plurality of steps comprising: displaying a topic tag for a chat using an instant messaging service that allows a user to send and receive text messages in real time with another user.”

Claim 1 recites “by performing a first plurality of steps comprising: displaying a topic tag for a chat using an instant messaging service that allows a user to send and receive text messages

in real time with an other user.” The Examiner cites *Briggs* (Fig. 8D that shows a "Topic Sharing" tab and displays a list of topics 892 for a user to select/deselect from, by clicking in the checkboxes 891 or specifying the topic tags 893 entered by the user; column 8, lines 42-45 disclose the same details; column 4, lines 32-40 that describe an instant messaging service that allows a user to send and receive text messages in real time with another user in a chat session).

Briggs teaches Topic Sharing, but is silent as to topic tags. *Briggs* teaches the sharing of topic folders between the topic folders creator and the creator’s buddies. *Briggs* does not teach Applicants’ invention which tags topics such that topics can 1) be searched 2) by a large number of participants, Applicants’ invention allows topics to be searched including participants not designated by the chat creator; e.g. management. In other words, management could search even though the creator did not include management. Furthermore, *Briggs* does not teach displaying a topic tag for a chat.

C. “determining whether the user wants to accept the topic tag”

Claim 1 recites “determining whether the user wants to accept the topic tag.” The Examiner cites *Briggs* (Fig. 8D, displayed topics list 892, checkboxes 891 for identifying a topic selected by the user, "+ Add Topic Area" 893 for a custom topic; the Instant Messaging System capable of determining whether the user wants to accept the topic tag by checking the status of the checkboxes selected by the user).

Briggs teaches topic sharing not topic tagging. *Briggs* does not teach accepting a topic tag once a chat has begun.

D. “responsive to determining that the user does not want to accept the topic tag, determining whether the user wants to distinguish the topic tag”

Claim 1 recites “responsive to determining that the user does not want to accept the topic tag, determining whether the user wants to distinguish the topic tag.” The Examiner cites *Briggs* (Fig. 8D, displayed topics list 892, checkboxes 891 for identifying a topic selected by the user, "+ Add Topic Area" 893 for a custom topic; the Instant Messaging System, responsive to determining that the user does not want to accept the topic tag, determining whether the user wants to distinguish the topic tag by identifying any data in the "+ Add Topic Area" 893 for a custom topic);

Briggs teaches topic sharing not topic tagging. *Briggs* does not teach accepting or declining a topic tag once a chat has begun. Furthermore, *Briggs* does not teach distinguishing a topic tag. *Briggs* teaches that a user can add a custom topic folder to share that is not part of the default list. For arguments sake, even if topic tagging and topic sharing were the same thing, *Brigg* does not teach topic sharing after a chat has begun.

E. “responsive to determining that the user wants to distinguish the topic tag, entering a term for the topic tag by the user”

Claim 1 recites “responsive to determining that the user wants to distinguish the topic tag, entering a term for the topic tag by the user.” The Examiner cites *Briggs* (Fig. 8D, "+ Add Topic Area" 893 for a custom topic that enables the user to distinguish the topic tag and the Instant Messaging System to determine that the user has distinguished the topic tag; Fig. 9 that displays the user selected/entered topic in the message text, thereby disclosing entering a term for the topic tag by the user in the message text).

Briggs teaches topic sharing not topic tagging. *Briggs* does not teach entering a term for the topic tag by user if the user wants to distinguish the initially displayed topic tag. In fact, *Briggs* is silent in regard to “distinguishing” anything. *Briggs* teaches that a user can add a custom topic folder to share that is not part of the default list. For arguments sake, even if topic tagging and topic sharing were the same thing, *Brigg* does not teach topic sharing after a chat has begun.

F. “responsive to entering a term for the topic tag, determining whether the other user accepts the term for the topic tag”

Claim 1 recites “responsive to entering a term for the topic tag, determining whether the other user accepts the term for the topic tag.” The Examiner cites *Briggs* (Fig. 8D which describes that each user will be able to turn the displayed topic areas on or off; column 8, lines 42-45 disclose the same details, thereby enabling the Instant Messaging System to determine whether the other user accepts the term for the topic tag).

Briggs teaches topic sharing not topic tagging. Moreover, even if topic sharing and topic tagging were the same thing, *Briggs* teaches that the user/creator will be able to turn the displayed topic areas on or off for each user-buddy, not that each user-buddy will be able to turn

the displayed areas on or off. The user/creator has all the control. Furthermore, *Briggs*' deals with sharing topics that have been created by the user, not creating topic tags. Applicants' invention allows either user participating in the chat to accept the terms for the topic tag. *Briggs* doesn't teach topic tagging after a chat has begun.

G. “responsive the other user not accepting the term for the topic tag, using a default topic tag as the topic tag”

Claim 1 recites “responsive the other user not accepting the term for the topic tag, using a default topic tag as the topic tag.”

The Examiner cites *Briggs* (column 8, lines 42-45 which further disclose that both default and particular user or user group administration is supported).

Briggs teaches topic sharing not topic tagging. Moreover, even if topic sharing and topic tagging were the same thing, *Briggs* teaches that the user/creator will be able to turn the displayed topic areas on or off for each user-buddy (whether it be a particular user-buddy or user-group-buddies), not that each user-buddy will be able to turn the displayed areas on or off. The user/creator has all the control. Furthermore, *Briggs*'s deals with sharing topics that have been created by the user, not creating topic tags after a chat has begun. Because of these reasons, *Briggs* could not reach this step.

H. “inserting the topic tag into the chat's text”

Claim 1 recites “inserting the topic tag into the chat's text.” The Examiner cites *Briggs* (Fig. 9, topic column 983 and message text column 984 that together show that the topic tag is inserted into the chat's text; column 9, lines 15-37 further describe the details of the columns shown in Fig. 9).

Briggs Fig. 9 describes a user interface for viewing buddy activities. *Briggs* teaches topic sharing not topic tagging. Furthermore, *Briggs*' deals with sharing topics that have been created by the user, not creating topic tags after a chat has begun. For arguments sake, even if topic tagging and topic sharing were the same thing, and even if *Briggs* taught creating topic tags after a chat had begun, *Briggs* does not teach inserting topic tags into the chat's text. *Briggs* teaches “viewing,” not “inserting,” “chat,” or “text.”

I. “responsive to the user identifying a subtopic tag for the chat, inserting the subtopic tag into the chat's text”

Claim 1 recites “responsive to the user identifying a subtopic tag for the chat, inserting the subtopic tag into the chat's text.” The Examiner cites *Briggs* (Fig. 8D, items 892 and 893; column 8, lines 42-45 which further disclose that topic or subtopic names 892 can be used; Fig. 9, topic column 983 and message text column 984 that together show that the topic/subtopic tag is inserted into the chat's text; column 9, lines 15-37 further describe the details of the columns shown in Fig. 9).

Briggs, Fig. 8D, teaches Topic Sharing not topic tags. *Briggs* teaches the sharing of topic/subtopic folders between the topic folders creator and the creator's buddies. Furthermore, *Briggs*' deals with sharing topics that have been created by the user, not creating topic tags after a chat has begun. For arguments sake, even if topic tagging and topic sharing were the same thing, and even if *Briggs* taught creating topic tags after a chat had begun, *Briggs* does not teach inserting topic tags into the chat's text. Fig. 9 describes a user interface for viewing buddy activities. *Briggs* teaches “viewing,” not “inserting,” “chat,” or “text.”

J. “determining whether a turn has occurred”

Claim 1 recites “determining whether a turn has occurred.”

The Examiner cites *Herf* (paragraph 0026, lines 1-6 which disclose that a "snapshot" of the state of the system may be taken when each comment is made (to detect whether a turn has occurred), and if the snapshot has changed substantially since the previous line in the conversation, the change is indicated with a thumbnail representing the change (determining whether a topic shift has occurred); paragraphs 0023, 0027, 0031, 0034, and 0054 further disclose the same details).

Herf provides for sharing media in conjunction with a chat and tracking when a chat participant has changed focus to a different media item by marking the area the media focus has changed. *Herf* does not teach topic tags or a search mechanism. The Applicants' program monitors when a turn has occurred, meaning a shift in textual communication indicated by successive statements. The term “turn” is defined in the specification, paragraph [0039]. “As used herein, the term ‘turn’ means a shift in textual communication during a chat indicated by successive statements.”

K. “responsive to determining that a turn has occurred, determining whether a topic shift has occurred”

Claim 1 recites “responsive to determining that a turn has occurred, determining whether a topic shift has occurred.” The Examiner cites *Herf* (paragraph 0026, lines 1-6 which disclose that a “snapshot” of the state of the system may be taken when each comment is made (to detect whether a turn has occurred), and if the snapshot has changed substantially since the previous line in the conversation, the change is indicated with a thumbnail representing the change (determining whether a topic shift has occurred); paragraphs 0023, 0027, 0031, 0034, and 0054 further disclose the same details).

Herf provides for sharing media in conjunction with a chat and tracking when a chat participant has changed focus to a different media item by marking the area the media focus has changed. *Herf* does not teach topic tags or a search mechanism. The Applicants’ program monitors when a turn has occurred, meaning a shift in textual communication; if a turn has occurred, the program determines whether a topic shift has occurred, and if a shift has occurred then the chat is tagged with another topic so that the chat can be searched through topic tags.

L. “responsive to determining that a topic shift has occurred, ii) repeating the first plurality of steps”

Claim 1 recites “responsive to determining that a topic shift has occurred, ii) repeating the first plurality of steps.” The Examiner cites *Herf* (paragraph 0026, lines 1-6 which disclose that a “snapshot” of the state of the system may be taken when each comment is made (to detect whether a turn has occurred), and if the snapshot has changed substantially since the previous line in the conversation, the change is indicated with a thumbnail representing the change (determining whether a topic shift has occurred); paragraphs 0023, 0027, 0031, 0034, and 0054 further disclose the same details). The Examiner further cites *Briggs* (Fig. 9 that shows a plurality of topics, each as a single row of analogous details, indicating repeating the steps of the first topic described above, for other subsequent topics).

Herf provides for sharing media in conjunction with a chat and tracking when a chat participant has changed focus to a different media item by marking the area the media focus has changed. *Herf* does not teach a search mechanism. ii) *see* Elements 1-10. *Briggs* teaches topic sharing not topic tagging.

M. “saving a transcript of the chat to a repository in an XML format”

Claim 1 recites “saving a transcript of the chat to a repository in an XML format.” The Examiner cites *Marston* (Fig. 1, database module 114 that stores message contents 130; paragraph 0021, lines 1-5 disclose the same details). The Examiner further cites *Bogard* (Fig. 3, Instant Messaging Server 308, Voice Portal 310; column 12, lines 15-18 that disclose using XML to import their buddy list and textual data from the IM Server 308 using XML files; column 6, lines 32-44 further disclose using VoiceXML (VXML) for mobile devices)

Bogard teaches importing XML files and using Voice XML to interpret voice applications. *Bogard* does not teach saving in an XML format.

N. “searching the repository”

Claim 1 recites “searching the repository.” The Examiner cites *Briggs* (Fig. 3, Search entry window 371 and Search (Find) button 372 that are used to accept search criteria from the user and search the repository for the content of desired items; Fig. 9, messages tab 965 that provides access to a message repository; filters 971 -973 are provided for a narrower focused search; column 6, lines 37-51 and column 8, lines 56-67 through column 9, lines 1-14 further disclose the same details). The Examiner admits that *Briggs* does not specifically disclose saving a transcript of the chat to a repository in XML format. So while Briggs does disclose the searching of a repository, it does not disclose searching the repository for a chat transcript.

O. “by performing a second plurality of steps comprising: determining whether the search will be a full text search”

Claim 1 recites “by performing a second plurality of steps comprising: determining whether the search will be a full text search.” The Examiner cites *Briggs* (Fig. 9, View activity window with a dropdown list of either "All Activity" or a select topic search and display; column 9, lines 8-9 that further disclose viewing of all or selected portions of a participant's activity by topic, thereby determining whether the search will be a full text search).

The Examiner admits that *Briggs* does not specifically disclose saving a transcript of the chat to a repository in XML format. So while Briggs does disclose the searching of a repository, it does not disclose searching the repository for a chat transcript. *Note: Not sure “All Activity”

means a full text search. It is not explicitly stated and to me, column 9, lines 8-9 speak of searching topic folders.

P. “responsive to determining that the search will not be a full text search, determining whether the search will be a filtered search”

Claim 1 recites “responsive to determining that the search will not be a full text search, determining whether the search will be a filtered search.” The Examiner cites *Briggs* (Figs. 3 and 9, who filter 971, topic filter 972, and view filter 973, search term window 974, find button 975, and advanced find button 976 that together provide filtering and focused search capabilities; column 9, lines 4-14 disclose the same details, providing means for a filtered search).

The Examiner admits that *Briggs* does not specifically disclose saving a transcript of the chat to a repository in XML format. So while *Briggs* does disclose the searching of a repository, it does not disclose searching the repository for a chat transcript.

Q. “responsive to determining that the search will be a filtered search, choosing a filter, wherein types of the filter comprise: a topic tag, a user name, or a date”

Claim 1 cites “responsive to determining that the search will be a filtered search, choosing a filter, wherein types of the filter comprise: a topic tag, a user name, and a date.” The Examiner cites *Briggs* (Figs. 3 and 9, who filter 971, topic filter 972, and view filter 973, search term window 974, find button 975, and advanced find button 976 that together provide filtering and focused search capabilities; column 9, lines 4-14 disclose the same details, providing means for a filtered search; Fig. 11; column 10, lines 54-56 which further disclose filter to select a range of dates; Fig. 9, column 988 shows the results of filtering by date).

Briggs teaches topic subject not topic tags. There is not filter to search topic tags only a filter to search by topic. Also, the Examiner states that *Briggs* does not specifically disclose saving a transcript of the chat to a repository in XML format. So while *Briggs* does disclose the searching of a repository, it does not disclose searching the repository for a chat transcript.

R. “conducting the search”

Claim 1 recites “conducting the search.” The Examiner cites *Briggs* (Fig. 10 that shows a display of hit list after the filtered search has been done; column 9, lines 58-67 through column 10, lines 1-6 disclose the details of conducting the search).

The Examiner admits that *Briggs* does not specifically disclose saving a transcript of the chat to a repository in XML format. So while Briggs does disclose the searching of a repository, it does not disclose searching the repository for a chat transcript.

S. “determining whether the search was satisfactory”

Claim 1 recites “determining whether the search was satisfactory.”

The Examiner cites *Briggs* (column 9, lines 30-35 which further disclose that in some instances, a user may need to access more detailed information about an activity in order to understand the topic involved, thereby disclosing determining whether the search was satisfactory).

Briggs teaches how a user can refine their search not determining whether the search was satisfactory. The Examiner states that *Briggs* does not specifically disclose saving a transcript of the chat to a repository in XML format. So while Briggs does disclose the searching of a repository it does not disclose searching the repository for a chat transcript.

T. “responsive to determining that the search was not satisfactory, entering feedback by the user”

Claim 1 recites “responsive to determining that the search was not satisfactory, entering feedback by the user.” The Examiner cites *Briggs* (Fig. 3, comments button 363 that when selected, activates a window for entering comments and feedback; column 6, lines 11-13 disclose the same details; Fig. 9, thumbs up/thumbs down 986 column, thoughts 987 column; column 9, lines 18-19 also describe the same details).

First, *Briggs* does not teach determining that the search was not satisfactory. Second, *Briggs* does not teach entering feedback by the user if a search was not satisfactory. Also, the Examiner states that *Briggs* does not specifically disclose saving a transcript of the chat to a

repository in XML format. So while Briggs does disclose the searching of a repository, it does not disclose searching the repository for a chat transcript.

U. “responsive to determining that the user wants to view the full text of a found topic, displaying a segment of the transcript corresponding to the found topic”

Claim 1 recites “responsive to determining that the user wants to view the full text of a found topic, displaying a segment of the transcript corresponding to the found topic.” The Examiner cites *Briggs* (Figs. 9-10, columns 983-988 that display a segment of the transcript corresponding to the found topic, with next and previous buttons for scrolling the remaining data; column 9, lines 15-67 describe the same details).

Briggs’ Figs. 9-10 teaches information on “who” did “what” “where” and “when” in what topic area. *Briggs* does not teach the user being able to view the full text of a found topic nor does *Briggs* teach displaying a segment of the transcript. Also, the Examiner states that *Briggs* does not specifically disclose saving a transcript of the chat to a repository in XML format. So while Briggs does disclose the searching of a repository, it does not disclose searching the repository for a chat transcript.

V. “responsive to determining that another search is to be conducted, repeating the second plurality of steps”

Claim 1 recites “responsive to determining that another search is to be conducted, repeating the second plurality of steps.” The Examiner cites *Briggs* (Fig. 10, column 10, lines 1-6 which further disclose that when the (new) desired filters are selected, the submit button 1055 signals for the screen to be refreshed with the new information, indicating repeating the plurality of steps disclosed above).

Briggs does not teach all of the steps.

W. “scanning topic tags from the transcript.”

Claim 1 recites “scanning topic tags from the transcript.” The Examiner cites *St. John* (paragraph 0061 which discloses that information items and their associated gists are stored in the active database 14 (in Fig. I), wherein each client 26 can query (scanning topic tags) the database to obtain information about the topics of interest to the client).

St. John allows the client to search the data base using key words to find topics of interest. A keyword search is a problem because the keyword can occur within the context of many different topics (Application [0009]). *St. John* does not teach topic tags.

X. “by performing a third plurality of steps comprising: comparing a scanned topic tag to an auto alert table”

Claim 1 recites “by performing a third plurality of steps comprising: comparing a scanned topic tag to an auto alert table.” The Examiner cites *St. John* (Figs. 1 and 6; paragraphs 0061-0063 that disclose a method of handling auto alerts by the document server 8; further disclosing that the auto-alert contains at least the item identifier of the involved information item and the category of the terms that triggers the auto-alert).

St. John searches the data base using key words to find topics of interest. *St. John* does not teach topic tags so comparing a scanned topic tag to an auto alert table cannot be taught.

Y. “responsive to determining that there is a match between the scanned topic tag and the auto alert table, determining and executing an action that is associated with the scanned topic tag in the auto alert table”

Claim 1 recites “responsive to determining that there is a match between the scanned topic tag and the auto alert table, determining and executing an action that is associated with the scanned topic tag in the auto alert table.” The Examiner cites *St. John* (further disclosing in paragraph 0063 that the client manager searches the client profiles (auto-alert tables) to identify each client to whom the identified item is to be sent).

St. John searches the data base using key words to find topics of interest. *St. John* does not teach topic tags so comparing a scanned topic tag to an auto alert table cannot be taught. *St. John*’s alert system is first sent to a client manager, who then sends the alert to the client. Applicants do not use a client manager. *St. John* does not teach the option of sending full text or a segment of the text that matches the pre-selected topic tag.

Z. “wherein the action comprises exporting the transcript to an e-mail”

Claim 1 recites “wherein the action comprises exporting the transcript to an e-mail.” The Examiner cites *St. John* (paragraph 0063 which states that in some cases, the auto-alert message may take the form of an e-mail containing the information item).

St. John does not use chat transcripts and teaches the use of a middle man, client manager, not a truly automated system. There is no option for full text or segment.

AA. “responsive to determining that there is another scanned topic tag ii) repeating the third plurality of steps”

Claim 1 recites “responsive to determining that there is another scanned topic tag ii) repeating the third plurality of steps.” The Examiner cites *Bogard* (column 10, lines 19-38 which show an introductory conversation topic that turns to a registration topic when the customer responds with a "No" to a question from the system). The Examiner further recites *Bogard* (corresponding to determining that the user is not a registered user by checking a table of registered users (comparing the user's entered userid with the entries in the registration table), and after determining that the entered userid "User1" matches an entry in the registered users table, executing an action by informing the user to select a different userid and then sending a confirmation e-mail for registration of the user; these steps are further disclosed by *St. John et al.* below).

Bogard teaches the use of phone based speech activation systems to communicate with Internet based IM services so that received messages can be converted from text to audio. Furthermore, *Bogard* does not teach topic tags (which are more than a key word search). Applicant's deals with an auto alert program which scans transcripts for identified topic tags.

BB. “wherein a plurality of bases upon which the determining whether a turn has occurred comprise: an amount of textual data entered; a time period; and or a plurality of successive statements”

Claim 1 recites “wherein a plurality of bases upon which the determining whether a turn has occurred comprise: an amount of textual data entered; a time period; and **or** a plurality of successive statements.”

The Examiner cites *Bogard* (column 10, lines 19-38 which disclose that a plurality of bases upon which the determining whether a turn has occurred comprise a plurality of successive statements about the registration process). *Solomon* (Fig. 27 where a topic turn is determined to have happened at Phase D (from topic 1 to topic 2), based on the plurality of successive statements at Phase D-F; paragraph 0124 discloses the same details.).

Bogard teaches the use of phone based speech activation systems to communicate with Internet based IM services so that received messages can be converted from text to audio. Furthermore, *Bogard* does not teach determining whether a turn has occurred much less a turn. Even if the steps in column 10, lines 19-38 were comparable to Applicants' invention (which it is not for previously stated reasons), there is no turn in the conversation because the entire conversation deals with the topic of registration. *Solomon* Fig. 27 is an argument process between two individuals which resembles a debate. *Solomon* teaches a learning tool. *Solomon* does not teach topic turns or whether a topic turn has occurred.

Therefore, the rejection of claim 36 under 35 U.S.C. § 103 has been overcome.

III. Conclusion

It is respectfully urged that the subject application is patentable over the cited reference(s) and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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